

1           Vanessa R. Waldref  
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3           Eastern District of Washington  
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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

9  
UNITED STATES OF AMERICA, )  
10 )  
Plaintiff, )  
11 )  
v. )  
12 )  
RICK T. GRAY and )  
13 )  
GRAY FARMS & CATTLE CO. LLC., )  
14 )  
Defendants )  
15 )

No.: 1:21-CV-03126-TOR  
UNITED STATES' MOTION  
FOR ENTRY OF DEFAULT

16 The United States of America, by and through Vanessa R. Waldref, United States  
17 Attorney for the Eastern District of Washington, Tyler H.L. Tornabene and Daniel Hugo  
18 Fruchter, Assistant United States Attorneys, respectfully move for an order of default,  
19 pursuant to Fed. R. Civ. P. 55(a) and LCivR 55(a), as to defendants Rick T. Gray and  
20 Gray Farms & Cattle Co. LLC., in that the defendants have not pleaded, answered, or  
21 otherwise defended against the affirmative relief sought in this cause as required by law.

Pursuant to LCivR 55(a), “Upon motion, the Clerk of Court shall enter the default of any party against whom a judgment for affirmative relief is sought and who has failed to plead or otherwise defend.”

This motion is based upon the attached Declaration of Tyler H.L. Tornabene, the exhibit attached thereto, and the records and files herein.

RESPECTFULLY SUBMITTED: February 15, 2022.

Vanessa R. Waldref  
United States Attorney

s/Tyler H.L. Tornabene  
Tyler H.L. Tornabene  
Assistant United States Attorney

1                   **CERTIFICATE OF SERVICE**

2                   I HEREBY CERTIFY that on February 15, 2022, a true and correct copy of the  
3 foregoing was sent by reliable electronic means to attorney Brian J. Waid, for Defendant  
4 Rick Gray and Defendant Gray Farms & Cattle Company, LLC, as follows:

5                   Brian J. Waid  
6                   Waid Law Office, PLLC  
7                   5400 California Ave. SW, Suite D  
8                   Seattle, WA 98136  
9                   Phone: (206) 388-1926  
10                  Email: [bjwaid@waidlawoffice.com](mailto:bjwaid@waidlawoffice.com)

11                  \_\_\_\_\_  
12                  *s/ Tyler H.L. Tornabene*  
13                  Assistant United States Attorney